

Exhibit A

Aaron Houchens

From: Aaron Houchens <ahouchens@shg-law.com>
Sent: Sunday, May 21, 2017 11:42 AM
To: 'Louise Gitcheva'
Cc: 'Warrington, David A.'; 'David Holt'; 'Seth Scott'; 'StephenM Smith'; 'Joan Brown'; 'Michelle Cain'; 'Jesse Binnall'; 'Potter, Erin B.'; 'Sorrell, Paris R.'; 'Machado, Leslie P.'
Subject: RE: Pitman v. Xcentric

Counsel,

Where are we on the protective order issue? We need to find some resolution on that issue this week as any further delay threatens our trial date. What do we need to do to move this forward? Do we need guidance from the Court?

I would appreciate your thoughts. If we cannot come to a resolution by the end of the week, we will file a motion with the Court for entry of an appropriate protective order.

Best,

Aaron

From: Louise Gitcheva [mailto:lgitcheva@harveybinnall.com]
Sent: Thursday, May 18, 2017 1:21 PM
To: Aaron Houchens <ahouchens@shg-law.com>
Cc: Warrington, David A. <David.Warrington@leclairryan.com>; David Holt <DHolt@attorneys4injured.com>; Seth Scott <SScott@attorneys4injured.com>; StephenM Smith <ssmith@braininjurylawcenter.com>; Joan Brown <JBrown@attorneys4injured.com>; Michelle Cain <MCain@attorneys4injured.com>; Jesse Binnall <jbinnall@harveybinnall.com>; Potter, Erin B. <Erin.Potter@leclairryan.com>; Sorrell, Paris R. <Paris.Sorrell@leclairryan.com>; Machado, Leslie P. <Leslie.Machado@leclairryan.com>
Subject: Re: Pitman v. Xcentric

Aaron,

Would you mind sending us the word version of the RFAs?

Thank you,

Louise

Louise T. Gitcheva
Associate
Harvey & Binnall, PLLC
717 King Street, Suite 300
Alexandria, Virginia 22314
(703) 888-1943
(703) 888-1930- facsimile

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On Tue, May 16, 2017 at 2:21 PM, Aaron Houchens <ahouchens@shg-law.com> wrote:

Counsel,

Please see the attached Requests for Admission and audio file.

A hard copy will follow via U.S. mail.

ABH

From: Warrington, David A. [mailto:David.Warrington@leclairryan.com]
Sent: Friday, May 12, 2017 10:17 AM
To: 'Aaron Houchens' <ahouchens@shg-law.com>; 'David Holt' <DHolt@attorneys4injured.com>
Cc: 'Seth Scott' <SScott@attorneys4injured.com>; 'StephenM Smith' <ssmith@braininjurylawcenter.com>; 'Joan Brown' <JBrown@attorneys4injured.com>; 'Michelle Cain' <MCain@attorneys4injured.com>; jbinnall@harveybinnall.com; lgitcheva@harveybinnall.com; Potter, Erin B. <Erin.Potter@leclairryan.com>; Sorrell, Paris R. <Paris.Sorrell@leclairryan.com>; Machado, Leslie P. <Leslie.Machado@leclairryan.com>
Subject: RE: Discovery Responses

No objection.

David A. Warrington
Attorney at Law
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David.Warrington@leclairryan.com
<https://www.leclairryan.com>

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From: Aaron Houchens [<mailto:ahouchens@shg-law.com>]
Sent: Friday, May 12, 2017 9:20 AM
To: Warrington, David A.; 'David Holt'
Cc: 'Seth Scott'; 'StephenM Smith'; 'Joan Brown'; 'Michelle Cain'; jbinnall@harveybinnall.com;
lgitcheva@harveybinnall.com; Potter, Erin B.; Sorrell, Paris R.; Machado, Leslie P.
Subject: RE: Discovery Responses

Counsel,

As we advised the court yesterday, we intend to file a motion seeking alternate service methods for Mr. Meade. I forgot to ask everyone after court, but does anyone have an objection to that motion. We would like to advise the court that this motion is being filed without the objection of the remaining defendants.

Thank you,

Aaron

From: Warrington, David A. [<mailto:David.Warrington@leclairryan.com>]
Sent: Wednesday, May 3, 2017 4:20 PM
To: 'Aaron Houchens' <ahouchens@shg-law.com>; 'David Holt' <DHolt@attorneys4injured.com>
Cc: 'Seth Scott' <SScott@attorneys4injured.com>; 'StephenM Smith' <ssmith@braininjurylawcenter.com>; 'Joan Brown' <JBrown@attorneys4injured.com>; 'Michelle Cain' <MCain@attorneys4injured.com>; jbinnall@harveybinnall.com;
lgitcheva@harveybinnall.com; Potter, Erin B. <Erin.Potter@leclairryan.com>; Sorrell, Paris R. <Paris.Sorrell@leclairryan.com>; Machado, Leslie P. <Leslie.Machado@leclairryan.com>
Subject: RE: Discovery Responses

Thanks Aaron. I am working with the client on this and they are trying to harmonize this with what is being drafted in the litigation in Iowa so that this works smoothly and the client doesn't end up having to conform to two regimes. Also, I will be sending a PDF to you with the documents as discussed yesterday, but we have had some technical difficulties. As soon as it is ready, we'll send it.

David A. Warrington
Attorney at Law
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<https://www.leclairryan.com>

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From: Aaron Houchens [<mailto:ahouchens@shg-law.com>]
Sent: Tuesday, May 02, 2017 11:17 PM
To: 'David Holt'; Warrington, David A.
Cc: 'Seth Scott'; 'StephenM Smith'; 'Joan Brown'; 'Michelle Cain'; jbinnall@harveybinnall.com;
lgitcheva@harveybinnall.com; Potter, Erin B.; Sorrell, Paris R.; Machado, Leslie P.
Subject: RE: Discovery Responses

Everyone,

Based on our call today, I am attaching a draft protective order. We discussed keeping this as simple as possible and we've tried to do that with this draft. Let me know if you require any changes.

Best,

Aaron

From: David Holt [<mailto:DHolt@attorneys4injured.com>]
Sent: Tuesday, May 2, 2017 2:44 PM
To: Warrington, David A. <David.Warrington@leclairryan.com>; 'Aaron Houchens' <ahouchens@shg-law.com>
Cc: Seth Scott <SScott@attorneys4injured.com>; StephenM Smith <ssmith@braininjurylawcenter.com>; Joan Brown <JBrown@attorneys4injured.com>; Michelle Cain <MCain@attorneys4injured.com>; jbinnall@harveybinnall.com;
lgitcheva@harveybinnall.com; Potter, Erin B. <Erin.Potter@leclairryan.com>; Sorrell, Paris R. <Paris.Sorrell@leclairryan.com>; Machado, Leslie P. <Leslie.Machado@leclairryan.com>
Subject: RE: Discovery Responses

David:

I'm confused. I just received an invite to a conference call.

But I Had already sent this around.

See below:

Pitman v. Xcentric, et al

Tue, May 2, 2017 2:45 PM - 3:15 PM EDT

Please join my meeting from your computer, tablet or smartphone.

<https://global.gotomeeting.com/join/888041173>

You can also dial in using your phone.

United States: +1 (571) 317-3122

Access Code: 888-041-173

David B. Holt

Brain Injury Law Center | The Smith Law Center

2100 Kecoughtan Road

Hampton, VA 23661

757.244.7000

<http://thesmithlawcenter.com>

From: Warrington, David A. [<mailto:David.Warrington@leclairryan.com>]

Sent: Tuesday, May 02, 2017 1:57 PM

To: 'Aaron Houchens'

Cc: David Holt; Seth Scott; StephenM Smith; Joan Brown; Michelle Cain; jbinnall@harveybinnall.com; lgitcheva@harveybinnall.com; Potter, Erin B.; Sorrell, Paris R.; Machado, Leslie P.

Subject: RE: Discovery Responses

Aaron,

It appears that our conference line system is down. Can I call you on your cell at 2:45? Or if you can set up a number, that would work as well.

Thanks,

Dave

David A. Warrington
Attorney at Law

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David.Warrington@leclairryan.com

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From: Aaron Houchens [<mailto:ahouchens@shg-law.com>]

Sent: Tuesday, May 02, 2017 1:09 PM

To: Warrington, David A.

Cc: David Holt; Seth Scott; StephenM Smith; Joan Brown; Michelle Cain; jbinnall@harveybinnall.com; lgitcheva@harveybinnall.com; Potter, Erin B.; Sorrell, Paris R.; Machado, Leslie P.

Subject: Re: Discovery Responses

David,

Can you do a call between 2:45- 3:15 today?

ABH

Sent from my iPhone

On May 2, 2017, at 12:04 PM, Warrington, David A. <David.Warrington@leclairryan.com> wrote:

If you are available later today or tomorrow I'd like to have a call about the production. We will produce the documents on a disc and bates numbered as

stated in the document responses, but as we have been going through documents, almost all of the documents have been stamped confidential in the Iowa litigation, and some are subject to the Iowa Court's injunction. I do not think any of us wants to run afoul of the protective order or injunction in that case and as the parties to that litigation are in the process of negotiating settlement to include terms of what will remain protected, I think we should discuss a protective order in this case and also how to provide you the documents in the most expeditious manner consistent with the orders in the Iowa case. I am available later this afternoon or tomorrow morning. I can circulate a call at a time that works for everyone.

David A. Warrington
Attorney at Law

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David.Warrington@leclairryan.com

<https://www.leclairryan.com>

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From: David Holt [<mailto:DHolt@attorneys4injured.com>]

Sent: Tuesday, May 02, 2017 10:22 AM

To: Warrington, David A.; 'ahouchens@shg-law.com'; Seth Scott; StephenM Smith; Joan Brown; Michelle Cain; 'jbinnall@harveybinnall.com'; 'lgitcheva@harveybinnall.com'

Cc: Potter; Erin B.; Sorrell, Paris R.; Machado, Leslie P.

Subject: RE: Discovery Responses

David:

Can we expect the document production in the mail? It's not clear how we are getting the documents we've requested and you've identified in these responses. They were due yesterday (after we gave you more time).

When can we expect them and by what means?

Thank you.

David B. Holt

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2100 Kecoughtan Road

Hampton, VA 23661

757.244.7000

<http://thesmithlawcenter.com>

From: Warrington, David A. [<mailto:David.Warrington@leclairryan.com>]

Sent: Monday, May 01, 2017 9:01 PM

To: David Holt; 'ahouchens@shg-law.com'; Seth Scott; StephenM Smith; Joan Brown; Michelle Cain; 'jbinnall@harveybinnall.com'; 'lgitcheva@harveybinnall.com'

Cc: Potter, Erin B.; Sorrell, Paris R.; Machado, Leslie P.

Subject: Discovery Responses

Counsel,

Please see attached.

Regards,

David A. Warrington
Attorney at Law

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